



# Your Missouri Courts

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<b>Case</b>	<b>Parties &amp; Attorneys</b>	<b>Docket Entries</b>	<b>Charges, Judgments &amp; Sentences</b>	<b>Service Information</b>	<b>Filings Due</b>	<b>Scheduled Hearings &amp; Trials</b>	<b>Civil Judgments</b>	<b>Garnishments/ Execution</b>
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[Click here to eFile on Case](#)Sort Date Entries: ☒

Descending

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[Click here to Respond to Selected Documents](#)☐ Ascending**06/13/2022** ☐ **Notice of Service**

Sheriffs Return of Service - Yasco Trucking, LLC. 22-SMCC-248

**Filed By:** ELIZABETH LENIVY**On Behalf Of:** DEANDRE WATSON, LARITA WATSON☐ **Summons Personally Served**

Document ID - 22-SMCC-248; Served To - YASCO TRUCKING, LLC; Server - ; Served Date - 07-JUN-22; Served Time - 11:14:00; Service Type - Sheriff Department; Reason Description - Served

**05/25/2022** ☐ **Summons Issued-Circuit**

Document ID: 22-SMCC-249, for BULJUBASIC, SABAN.

☐ **Summons Issued-Circuit**

Document ID: 22-SMCC-248, for YASCO TRUCKING, LLC.

**05/06/2022** ☐ **Filing Info Sheet eFiling****Filed By:** ELIZABETH LENIVY☐ **Pet Filed in Circuit Ct**

Petition.

**Filed By:** ELIZABETH LENIVY**On Behalf Of:** DEANDRE WATSON, LARITA WATSON☐ **Judge Assigned**

Case.net Version 5.14.52

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Released 06/08/2022



**IN THE CIRCUIT COURT OF LINCOLN COUNTY, MISSOURI  
FORTY-FIFTH JUDICIAL CIRCUIT**

**DEANDRE WATSON &  
LARITA WATSON,**

**Plaintiffs,**

**v.**

**YASCO TRUCKING, LLC**

Serve: Jasmin Omerovic – Registered Agent  
7017 Colfax Ave.,  
Lincoln, NE 68507

**SABAN BULJUBASIC**

Serve: 1521 W. 8<sup>th</sup> St., Apt. 4  
Spokane, WA 99204

**Defendants.**

Case No.

**Jury Trial Demanded**

**PETITION**

COME NOW Plaintiffs DeAndre Watson and Larita Watson (“Plaintiffs”), by and through their undersigned counsel, and for their claims and causes of action against Defendants Yasco Trucking, LLC and Saban Buljubasic, make the following allegations.

**PARTIES, JURISDICTION, AND VENUE**

1. Plaintiff DeAndre Watson is and was at all times relevant a resident of St. Louis County, Missouri.
2. Plaintiff Larita Watson, a resident of St. Louis County, Missouri, is the lawfully wedded spouse of Plaintiff DeAndre Watson.
3. Defendant Yasco Trucking, LLC (“Yasco”) is and was at all times relevant a duly organized and existing Nebraska limited liability company with its primary principal place of business in Lincoln, State of Nebraska.

4. At all times relevant herein, Defendant Yasco acted by and through its agents, servants, and employees, including Defendant Saban Buljubasic, who acted within the course and scope of their agency, servantry, and/or employment.

5. Defendant Yasco is a licensed interstate motor carrier (U.S. DOT Number 2584506) that employs commercial truck drivers to transport freight through multiple states, including through the State of Missouri, for profit.

6. Defendant Saban Buljubasic is and was at all times relevant a resident of the State of Washington.

7. Defendant Buljubasic was, at all times relevant, an employee, servant, and/or agent of Defendant Yasco and was acting in the scope and course of his employment, servantry, and/or agency for Defendant Yasco in June of 2017.

8. Personal jurisdiction is proper over Defendants in this action because each transacted business in the State of Missouri and each committed tortious acts in the State of Missouri.

9. Venue is proper in the Circuit Court of Lincoln County pursuant to Mo. Rev. Stat. § 508.010.4, because Plaintiff DeAndre Watson was first injured in Lincoln County, Missouri.

### **FACTUAL ALLEGATIONS**

10. On or about June 5, 2017, Defendant Buljubasic was operating a 2005 Freightliner Columbia semi-truck (VIN 1FUJA6CK85LU02185) (“the subject truck”) southbound on US Highway 61 in Lincoln County, Missouri at approximately 2:20 PM.

11. Defendant Buljubasic was operating the subject truck as part of his employment, servantry, and agency with Defendant Yasco, and was working and acting in the course and scope of his employment, servantry, and/or agency for Defendant Yasco.

12. On June 5, 2017, Plaintiff DeAndre Watson was traveling southbound on US Highway 61 in his 2012 Freightliner Cascadia semi-truck ahead of Defendant Buljubasic.

13. While traveling on Highway 61 in Lincoln County, Plaintiff DeAndre Watson began slowing down to let another truck out so that he could then make a right turn into a private drive.

14. Defendant Buljubasic failed to keep a careful lookout and, thus, failed to recognize Plaintiff DeAndre Watson slowing down.

15. Defendant Buljubasic failed to bring the subject truck to a stop in a timely manner and crashed into the rear end of Plaintiff's truck at a high rate of speed.

16. As a result of the collision, Plaintiff sustained serious personal injury including pain to his head, neck, bilateral shoulders, left upper extremity, cervical and lumbar spine, mid-lower back, and right knee.

17. As a result of his injuries, Plaintiff underwent a C5 corpectomy/C4-6 anterior cervical discectomy with fusion.

18. As a result of his injuries, Plaintiff was unable to work for several weeks.

**COUNT I**  
**NEGLIGENCE (vs. Defendant Yasco Trucking, LLC)**

19. Plaintiffs incorporate the above allegations as though fully set forth herein.

20. At all times relevant, Defendant Yasco owed a duty to Plaintiff DeAndre Watson and others to exercise the highest degree of care in the operation of the subject truck.

21. Defendant Yasco, by and through its agents, servants, and employees, breached this duty owed to Plaintiff and others and was thereby negligent in one or more of the following respects:

- a. Defendant negligently and carelessly rear-ended Plaintiff's vehicle;

- b. Defendant negligently and carelessly drove too fast for traffic conditions;
- c. Defendant negligently and carelessly failed to apply the brakes in a timely manner;
- d. Defendant negligently and carelessly operated the vehicle in a careless and reckless manner;
- e. Defendant negligently and carelessly drove while distracted;
- f. Defendant negligently and carelessly failed to keep a careful lookout;
- g. Defendant negligently and carelessly failed to swerve or steer the vehicle to avoid the collision;
- h. Defendant negligently and carelessly failed to take appropriate evasive action; and
- i. Such further negligent and careless acts and omissions as the evidence.

22. As a direct and proximate result of the negligence and carelessness of Defendant Yasco, Plaintiff suffered serious personal injuries, requiring him to undergo medical and diagnostic care and treatment, including surgery and physical therapy, and has been caused to suffer fear, stress, pain, suffering, anxiety, and loss of enjoyment of life.

23. As a direct and proximate result of the negligence and carelessness of Defendant Yasco, Plaintiff has been caused to undergo reasonable medical, diagnostic, and physical therapy care and treatment, and has incurred expenses for said treatment and will be caused to undergo additional treatment in the future and will incur the costs associated therewith.

24. As a direct and proximate result of the negligence and carelessness of Defendant Yasco, Plaintiff has sustained lost wages, earnings, and income.

WHEREFORE, Plaintiffs pray for judgment against Defendant for a fair and reasonable amount in excess of Twenty-Five Thousand (\$ 25,000.00), for pre and post-judgment interest as provided by law, for costs incurred herein, and for such other and further relief as the Court deems just and proper under the circumstances.

**COUNT II**  
**NEGLIGENCE (vs. Defendant Saban Buljubasic)**

25. Plaintiffs incorporate the above allegations as though fully set forth herein.
26. At all times relevant, Defendant Buljubasic owed a duty to Plaintiff DeAndre Watson and others to exercise the highest degree of care in the operation of the subject truck.
27. Defendant Buljubasic breached this duty owed to Plaintiff and others and was thereby negligent in one or more of the following respects:
  - a. Defendant negligently and carelessly rear-ended Plaintiff's vehicle;
  - b. Defendant negligently and carelessly drove too fast for traffic conditions;
  - c. Defendant negligently and carelessly failed to apply the brakes in a timely manner;
  - d. Defendant negligently and carelessly operated the vehicle in a careless and reckless manner;
  - e. Defendant negligently and carelessly drove while distracted;
  - f. Defendant negligently and carelessly failed to keep a careful lookout;
  - g. Defendant negligently and carelessly failed to swerve or steer the vehicle to avoid the collision;
  - h. Defendant negligently and carelessly failed to take appropriate evasive action;  
and
  - i. Such further negligent and careless acts and omissions as the evidence.

28. As a direct and proximate result of the negligence and carelessness of Defendant Buljubasic, Plaintiff suffered serious personal injuries, requiring him to undergo medical and diagnostic care and treatment, including surgery and physical therapy, and has been caused to suffer fear, stress, pain, suffering, anxiety, and loss of enjoyment of life.

29. As a direct and proximate result of the negligence and carelessness of Defendant Buljubasic, Plaintiff has been caused to undergo reasonable medical, diagnostic, and physical therapy care and treatment, and has incurred expenses for said treatment and will be caused to undergo additional treatment in the future and will incur the costs associated therewith.

30. As a direct and proximate result of the negligence and carelessness of Defendant Buljubasic, Plaintiff has sustained lost wages, earnings, and income.

WHEREFORE, Plaintiffs pray for judgment against Defendant for a fair and reasonable amount in excess of Twenty-Five Thousand (\$ 25,000.00), for pre and post-judgment interest as provided by law, for costs incurred herein, and for such other and further relief as the Court deems just and proper under the circumstances.

**COUNT III**  
**LOSS OF CONSORTIUM (vs. Defendant Yasco Trucking, LLC)**

31. Plaintiffs incorporate the above allegations as though fully set forth herein.

32. At all times relevant to this cause of action, Plaintiff Larita Watson was the lawfully wedded spouse of Plaintiff DeAndre Watson.

33. As a direct and proximate result of the aforesaid negligent acts or omissions, Plaintiff Larita Watson lost the services, support, society and consortium of her husband, Plaintiff DeAndre Watson, and shall lose same in the future.

WHEREFORE, Plaintiffs pray for judgment against Defendant for a fair and reasonable amount in excess of Twenty-Five Thousand (\$ 25,000.00), for pre and post-judgment interest as

provided by law, for costs incurred herein, and for such other and further relief as the Court deems just and proper under the circumstances.

**COUNT IV**  
**LOSS OF CONSORTIUM (vs. Defendant Saban Buljubasic)**

34. Plaintiffs incorporate the above allegations as though fully set forth herein.

35. At all times relevant to this cause of action, Plaintiff Larita Watson was the lawfully wedded spouse of Plaintiff DeAndre Watson.

36. As a direct and proximate result of the aforesaid negligent acts or omissions, Plaintiff Larita Watson lost the services, support, society and consortium of her husband, Plaintiff DeAndre Watson, and shall lose same in the future.

WHEREFORE, Plaintiffs pray for judgment against Defendant for a fair and reasonable amount in excess of Twenty-Five Thousand (\$ 25,000.00), for pre and post-judgment interest as provided by law, for costs incurred herein, and for such other and further relief as the Court deems just and proper under the circumstances.

DATED:

Respectfully Submitted,

THE SIMON LAW FIRM, P.C.

By: /s/ Elizabeth Lenivy

John G. Simon, #35231  
Elizabeth S. Lenivy #68469  
800 Market Street, Ste. 1700  
St. Louis, MO 63101  
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*Attorneys for Plaintiffs*






## IN THE 45TH JUDICIAL CIRCUIT, LINCOLN COUNTY, MISSOURI

Judge or Division: GREGORY K. ALLSBERRY	Case Number: 22L6-CC00047	(Date File Stamp)
Plaintiff/Petitioner: DEANDRE WATSON	Plaintiff's/Petitioner's Attorney/Address ELIZABETH LENIVY 800 MARKET STREET SUITE 1700 ST LOUIS, MO 63101	
Defendant/Respondent: YASCO TRUCKING, LLC	Court Address: LINCOLN COUNTY JUSTICE CENTER 45 BUSINESS PARK DRIVE TROY, MO 63379	
Nature of Suit: CC Pers Injury-Vehicular		

## Summons in Civil Case

The State of Missouri to: YASCO TRUCKING, LLC	
Alias:	
7017 COLFAX AVENUE LINCOLN, NE 68507	
	You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.
COURT SEAL OF LINCOLN COUNTY	
05-25-2022	/S/ L GOODMAN
Date	Clerk
Further Information:	

## Sheriff's or Server's Return

**Note to serving officer:** Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above Summons by: (check one)

- ☐ delivering a copy of the summons and petition to the defendant/respondent.
- ☐ leaving a copy of the summons and petition at the dwelling house or usual place of abode of the defendant/respondent with \_\_\_\_\_, a person at least 18 years of age residing therein.
- ☐ (for service on a corporation) delivering a copy of the summons and petition to: \_\_\_\_\_ (name) \_\_\_\_\_ (title).
- ☐ other: \_\_\_\_\_

Served at \_\_\_\_\_ (address)  
in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

**Must be sworn before a notary public if not served by an authorized officer:**

Subscribed and sworn to before me on \_\_\_\_\_ (date).

(Seal)

My commission expires: \_\_\_\_\_

Date

Notary Public

## Sheriff's Fees, if applicable

Summons	\$ _____
Non Est	\$ _____
Sheriff's Deputy Salary	
Supplemental Surcharge	\$ 10.00
Mileage	\$ _____ ( _____ miles @ \$. _____ per mile)
<b>Total</b>	<b>\$ _____</b>


A copy of the summons and petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



## IN THE 45TH JUDICIAL CIRCUIT, LINCOLN COUNTY, MISSOURI

Judge or Division: GREGORY K. ALLSBERRY	Case Number: 22L6-CC00047	(Date File Stamp)
Plaintiff/Petitioner: DEANDRE WATSON	Plaintiff's/Petitioner's Attorney/Address ELIZABETH LENIVY 800 MARKET STREET SUITE 1700 ST LOUIS, MO 63101	
Defendant/Respondent: YASCO TRUCKING, LLC	Court Address: LINCOLN COUNTY JUSTICE CENTER 45 BUSINESS PARK DRIVE TROY, MO 63379	
Nature of Suit: CC Pers Injury-Vehicular		

## Summons in Civil Case

The State of Missouri to: <b>SABAN BULJUBASIC</b>	
Alias:	
1521 W. 8TH STREET APT. 4 SPOKANE, WA 99204	
<b>COURT SEAL OF</b>  <b>LINCOLN COUNTY</b>	<b>You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.</b>
05-25-2022 Date	/S/ L GOODMAN Clerk
Further Information:	

## Sheriff's or Server's Return

**Note to serving officer:** Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above Summons by: (check one)

- ☐ delivering a copy of the summons and petition to the defendant/respondent.
- ☐ leaving a copy of the summons and petition at the dwelling house or usual place of abode of the defendant/respondent with \_\_\_\_\_, a person at least 18 years of age residing therein.
- ☐ (for service on a corporation) delivering a copy of the summons and petition to: \_\_\_\_\_ (name) \_\_\_\_\_ (title).
- ☐ other: \_\_\_\_\_

Served at \_\_\_\_\_ (address)  
in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

**Must be sworn before a notary public if not served by an authorized officer:**

Subscribed and sworn to before me on \_\_\_\_\_ (date).

(Seal)

My commission expires: \_\_\_\_\_

Date

Notary Public

## Sheriff's Fees, if applicable

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Sheriff's Deputy Salary

Supplemental Surcharge \$ 10.00

Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$. \_\_\_\_\_ per mile)

**Total** \$ \_\_\_\_\_

A copy of the summons and petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

## LANCASTER COUNTY SHERIFF'S OFFICE

Lincoln, Nebraska 68508

## Process Service Return

Of Sheriff's Paper # 206248 to LINCOLN, MO County CIRCUIT Court  
 Document No: 999999999999 Case No: 22L6 CC00047

Received	Returned	Service and Return	\$ 35.00
06/03/2022	06/08/2022	Copy	

Type of Process	Mileage		
SUMMONS	Miscellaneous		
	Total Fees	\$	35.00

Copy of PETITION

Paid by THE SIMON LAW FIRM PC

Attorney Code

Witness Fee Paid \$

Clerk Fee Paid \$

=====

Plaintiff  
 WATSON, DEANDRE

Defendant  
 YASCO TRUCKING LLC

=====

Party Served: YASCO TRUCKING LLC

7017 COLFAX AVE

LINCOLN NE

By leaving with: JASMIN OMEROVIC/OWNER

SRVD @ RES 4000 S 56TH ST #238A

Service Type: PERSONAL

Service Date: 06/07/2022 , 1114 By: A CASAREZ

I hereby certify that at the time and in the manner herein stated, I served the within writ, together with copies shown, on the herein named party(s) a true and certified copy thereof with all endorsements thereon, or returned said writ unserved in the prescribed manner.

All done in Lancaster County, Nebraska, as required by law.

TERRY T. WAGNER, Sheriff

By /s/ANGELO CASAREZ



## IN THE 45TH JUDICIAL CIRCUIT, LINCOLN COUNTY, MISSOURI

Judge or Division: GREGORY K. ALLSBERRY	Case Number: 22L6-CC00047
Plaintiff/Petitioner: DEANDRE WATSON	Plaintiff's/Petitioner's Attorney/Address ELIZABETH LENIVY 800 MARKET STREET SUITE 1700 ST LOUIS, MO 63101
Defendant/Respondent: YASCO TRUCKING, LLC	Court Address: LINCOLN COUNTY JUSTICE CENTER 45 BUSINESS PARK DRIVE TROY, MO 63379
Nature of Suit: CC Pers Injury-Vehicular	(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: YASCO TRUCKING, LLC  
Alias:

7017 COLFAX AVENUE  
LINCOLN, NE 68507

COURT SEAL OF  
LINCOLN COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

05-25-2022 Date /S/ L GOODMAN Clerk

Further Information:

## Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above Summons by: (check one)

- ☐ delivering a copy of the summons and petition to the defendant/respondent.  
☐ leaving a copy of the summons and petition at the dwelling house or usual place of abode of the defendant/respondent with

\_\_\_\_\_, a person at least 18 years of age residing therein.

☒ (for service on a corporation) delivering a copy of the summons and petition to:  
Yasco Trucking LLC (name) Jasmin Omerovic - Owner (title).

☐ other: \_\_\_\_\_

Served at Residence - 4000 S 56th St #238 A (address)  
 in Lancaster Nebr (County/City of St. Louis, MO, on 6-7-22 (date) at 11:14am (time).

Dep Angelo Casarez  
 Printed Name of Sheriff or Server

Angelo Casarez #273  
 Signature of Sheriff or Server

GENERAL NOTARY - State of Nebraska  
 MARGARET R. STINSON  
 My Comm. Exp. July 7, 2024

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on June 9, 2022 (date).

My commission expires: July 7, 2024 Margaret R. Stinson  
 Date Notary Public

## Sheriff's Fees, if applicable

Summons \$ 35.00  
 Non Est \$ \_\_\_\_\_  
 Sheriff's Deputy Salary  
 Supplemental Surcharge \$ 10.00  
 Mileage \$ \_\_\_\_\_ (\_\_\_\_\_ miles @ \$\_\_\_\_\_ per mile)  
 Total \$ 35.00

A copy of the summons and petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.